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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

---X

CLARENDON NATIONAL INSURANCE COMPANY and CLARENDON AMERICA INSURANCE COMPANY,

Plaintiffs,

v.

TRUSTMARK INSURANCE COMPANY

Defendant.

---X 09 cv 9896 (BSJ-MHD)

TRUSTMARK INSURANCE COMPANY

Defendant, Counter-Plaintiff.

v.

CLARENDON NATIONAL INSURANCE COMPANY and CLARENDON AMERICA INSURANCE COMPANY,

Plaintiffs, Counter-Defendants.

---X

DECLARATION OF BRIAN J. NEFF, ESQ., IN SUPPORT OF TRUSTMARK'S MEMORANDUM OF LAW IN OPPOSITION TO CLARENDON'S MOTION FOR A PROTECTIVE ORDER, FOR SATISFACTION OF JUDGMENT, AND FOR A STAY

I, Brian J. Neff, Esq., declare, under penalty of perjury and 28 U.S.C. § 1746, that the following is true and correct:

1. I am counsel to the law firm of Schiff Hardin LLP, counsel for Defendant Trustmark Insurance Company ("Trustmark"). I am a member in good standing of the Bar of the State of New York. I am familiar with the proceedings in this case. I submit this Declaration in support of Trustmark's Memorandum of Law in Opposition to Clarendon's Motion for a Protective Order, for Satisfaction of Judgment under Section 60(b)(5), and for a Stay under Section 62(b)(4).

2. Attached as Exhibit 1 is a true and correct copy of the Transcript of Hearing, *Clarendon Nat'l Ins. Co. v. Trustmark Ins. Co.*, 09 cv 9896, dated Jan. 26, 2011.

3. Attached as Exhibit 2 is a true and correct copy of the A.M. Best press release, "A.M. Best Places Ratings of Clarendon Insurance Group Under Review With Negative Implications," dated Dec. 28, 2010.

4. Attached as Exhibit 3 is a true and correct copy of Rule 58.1 of the Local Rules of the United States District Court, Northern District of Illinois.

Executed on: February 1, 2011
New York, NY

By: ______________________
Brian J. Neff, Esq.